



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 29, 2021

By ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Granted.
Denise Cote
1/3/22

Re: *United States v. Patrick Ndukwe et al.*, 21 Cr. 700 (DLC)

Dear Judge Cote:

The Government writes to respectfully request an extension of the deadline to produce Rule 16 discovery in the above-referenced matter from December 31, 2021 – the current deadline for producing Rule 16 discovery – until January 14, 2022.

On November 15, 2021, a grand jury returned an indictment charging defendants Patrick Ndukwe, David Travers, and Michelle Martin with numerous offenses related to a scheme to defraud Medicaid. On December 3, 2021, the Court held an initial pretrial conference. At the conference, the Government sought, and the Court granted, a deadline of December 31, 2021, to produce Rule 16 discovery. The defendants' pretrial motions are due by December 2, 2022 and trial is scheduled for April 3, 2023.

Since the December 3, 2021 conference, the Government has produced more than 165,000 pages of Rule 16 discovery, including, among other documents, search warrants, medical records, financial records, service provider records, electronic device extractions, records from border searches, and Medicaid recipient records. The Government is continuing to collect and review additional discovery, including the returns from electronic accounts seized pursuant to search warrants and electronic devices seized in connection with the defendants' arrests.

Because the collection, processing, review, and production of this additional discovery will not be complete by the current deadline of December 31, 2021, the Government respectfully requests that an additional period of 14 days to produce this Rule 16 discovery, until January 14, 2022.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel for all Defendants (via ECF)